



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
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ATLANTA, GEORGIA 30303-8960

September 24, 2015

Mr. Pedro Ramos
Superintendent, Everglades National Park
National Park Service
40001 State Road 9336
Homestead, FL 33034-6733

SUBJECT: Final General Management Plan/East Everglades Wilderness Study/
Environmental Impact Statement; CEQ Number: 20150241

Dear Mr. Ramos:

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the subject Final General Management Plan/East Everglades Wilderness Study/Environmental Impact Statement (FEIS). The National Park Service (NPS) is the lead federal agency for the proposed action.

Everglades National Park was dedicated in 1947 with 460,000 acres. As a result of various boundary additions, the park now encompasses 1,509,000 acres, including the largest legislated wilderness area (1,296,500 acres) east of the Rocky Mountains.

The last comprehensive effort for the Everglades National Park was completed in 1979. Much has occurred since then such as patterns and types of visitor use have changed, the Comprehensive Everglades Restoration Plan was approved, and in 1989 the East Everglades Addition (109,600 acres) was added to restore the Northeast Shark River Slough and enhance freshwater flows from the northern end of the park to Florida Bay. Recent studies have enhanced the NPS's understanding of resources, the threats to these resources, and visitor use in the national park. This general management plan will provide updated management direction for the entire national park, including the East Everglades Addition.

The NPS published the Draft General Management Plan/East Everglades Wilderness Study/Environmental Impact Statement (DEIS) in the Federal Register in April of 2013. The EPA commented on the DEIS in a letter dated April 15, 2013.

The FEIS presents and analyzes four alternative ways of managing Everglades National Park for the next 20 or more years: Alternative 1 (No action), the NPS preferred alternative, Alternative 2, and Alternative 4. Below is a brief description of each alternative.

Alternative 1 (No action) provides a baseline for evaluating changes and impacts of the three action alternatives. No wilderness is proposed for the East Everglades Addition in Alternative 1.

The NPS preferred alternative would support restoration of natural systems while providing improved opportunities for quality visitor experiences. This alternative proposes approximately 80,100 acres for designation as wilderness and an estimated 9,900 acres for designation as potential wilderness within the East Everglades Addition. This alternative will use an adaptive management approach and establishes a park advisory committee to assist the NPS in decision-making.

Alternative 2 would strive to maintain and enhance visitor opportunities and protect natural systems while preserving many traditional routes and ways of visitor access. It proposes 39,500 acres for designation as wilderness within the East Everglades Addition. Alternative 2 would provide a high level of support for protecting natural systems while improving opportunities for certain types of visitor activities.

Alternative 4 would eliminate commercial airboat tours within the park. It proposes 42,700 acres for designation as wilderness and 59,400 acres for designation as potential wilderness within the East Everglades Addition.

All four alternatives, including the No action alternative, would enhance Flamingo Concession Services and facilities but at a reduced level from what was described in the 2008 Commercial Services Plan. All of the action alternatives include construction of the Marjory Stoneman Douglas visitor facility at Gulf Coast, and each of these three alternatives would provide different new visitor opportunities.

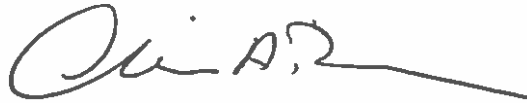
In the EPA's comment letter dated April 15, 2013, the EPA made recommendations regarding water quality, green building, and green parking lots. The EPA appreciates the NPS discussing potential green building opportunities in the FEIS. However, our comments regarding water quality and green parking lots were not addressed in the FEIS. Additionally, the EPA's comment regarding green buildings and parking lots were not included in the *Comment Analysis and Response Report* (Appendix I, Volume II). The EPA also thought it was difficult to find the NPS's response to resource agency comments in the *Comment Analysis and Response Report* and recommends that the NPS specifically address resource agencies' comments separately in any future EISs.

Of particular environmental concern is the lack of information regarding the state of Florida's numeric nutrient criteria (NNC) for streams, lakes, springs, estuaries and coastal waters and its applicability to Everglades National Park. Given the importance of the NNC on the Everglades National Park's unique and significant natural resources, the EPA is very concerned that the NPS did not incorporate our recommendations into the FEIS. The EPA strongly encourages the NPS better describe the NNC and water quality impacts in any future Everglades National Park EISs. Furthermore, the NPS's Record of Decision (ROD) for this proposed general management plan should address this deficiency as the EPA has identified. The EPA also notes

that in Appendix D that the proposed River of Green Grass (ROGG) project is identified. The EPA has separately reviewed the feasibility study for this proposed NPS joint project with the Federal Highway Administration and the Florida Department of Transportation and has potential environmental concerns for its implementation.

Please provide the EPA with a copy of the ROD when it becomes available. Please contact Jamie Higgins of my staff at (404) 562- 9681, should you have any questions or wish to discuss our comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris A. Militscher", with a long horizontal flourish extending to the right.

Christopher A. Militscher
Chief, NEPA Program Office
Resource Conservation and Restoration Division